

**IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF WISCONSIN  
MILWAUKEE DIVISION**

**ANDREW L. COLBORN,**

**Plaintiff,**

**vs.**

**NETFLIX, INC.; CHROME MEDIA  
LLC, F/K/A SYNTHESIS FILMS, LLC;  
LAURA RICCIARDI; AND MOIRA  
DEMOS,**

**Defendants.**

**Civil No.: 19-CV-484-BHL**

**DEFENDANTS' JOINT MOTION TO RESTRICT**

Pursuant to General Local Rule 79(d), Defendant Netflix, Inc., Chrome Media LLC, Moira Demos, and Laura Ricciardi (collectively, “the Defendants”) submit this Motion to Restrict (“Motion”) in connection with their Joint Response to Plaintiff Andrew Colborn’s Additional Proposed Findings of Fact (“Joint Response”). In support of this Motion, the Defendants state as follows:

1. Pursuant to the Court’s Order granting the parties’ Joint Motion to Amend the Scheduling Order (Dkt. 297), the Defendants are filing their summary judgment reply briefs today, December 9, 2022.
2. As part and in support of their summary judgment reply briefs, and in compliance with Local Rule 56(b)(3), the Defendants file their Joint Response to Plaintiff Andrew Colborn’s Additional Proposed Findings of Fact (“CAPFF”). Therein, the Defendants cite to certain materials in the record currently filed under restriction and on which the Court has not yet ruled.

3. Because these records were designated confidential by parties other than the Defendants, they take no position regarding whether good cause exists for them to remain restricted from public access.

4. As the Joint Response discusses the content of a currently-restricted document, the Defendants now file a redacted version of the Joint Response conventionally and an unredacted version under restriction.

Dated: December 9, 2022

Respectfully submitted,

s/ Leita Walker

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